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*ADMITTED IN NY & NJ

May 7, 2018

BY ECF and EMAIL

Hon. Eric N. Vitaliano United States District Court Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

> Re: <u>United States v. DiScala, et al.</u>, S-1 Cr-14-399 (ENV)

Dear Judge Vitaliano:

I represent Defendant Kyleen Cane in the above-referenced matter. I write to submit to the Court an order exonerating bail and directing the Pretrial Services Agency to return Ms. Cane's passport to her, and a Release and Satisfaction of Confession of Judgment, which will remove the lien from the real estate Ms. Cane posted to secure her bail.

Ms. Cane informs me that her Pretrial Services Officer in Las Vegas needs a written order exonerating bail and directing the return of Ms. Cane's passport in order to return Ms. Cane's passport to her. The enclosed proposed order should suffice for this purpose.

When bail was posted on Ms. Cane's behalf by predecessor counsel, a Confession of Judgment was entered in favor of the District Court to establish a lien in favor of the Court against certain property owned by Ms. Cane in Las Vegas. For the Court's information, a copy of the original Confession of Judgment is enclosed.

A copy of a Release and Satisfaction of Confession of Judgment prepared by Ms. Cane in the proper Nevada format is also enclosed. A representative of the District Court must sign this document before it can be recorded to remove the lien from the property Ms. Cane posted for bail. I am unsure exactly who should sign this document, but I believe the Clerk of Court may be the appropriate person, and I am sure the Court can get this signed with Mr. Villanueva's help.

SERCARZ & RIOPELLE, LLP

Once the enclosed Release and Satisfaction has been signed, please have Mr. Villanueva forward the original, inked copy to me, and I will send it on to Ms. Cane for filing, after I receive the signed copy.

Again, on behalf of Ms. Cane, Mr. Caliendo, and myself we thank the Court for its attention to this matter.

Respectfully submitted,

toland G. Riopelle

Cc: All Parties (By ECF and Email)